



Strengthening Downtowns...

January 27, 2016

Michigan House Local Governance Committee

RE: Testimony Against Proposed Bill to "Modernize" PA 169 of 1970

Dear Chair Chatfield and Committee Members:

On behalf of the Michigan Downtown Association and its members, I am writing against the proposed modifications to PA 169 of 1970. Historic designation and historic preservation are key tools for supporting downtown revitalization, and this bill threatens this vital community development tool.

Historic preservation projects are often catalytic redevelopment projects in Michigan downtowns. Historic buildings are often the first developed in our downtown cores, and they lead to significant investment and placemaking activities within our communities.

Eliminating the requirements to follow the Secretary of the Interiors' Standards for Rehabilitation -- the Nation's accepted best practices for projects -- is very concerning. The Federal Historic Tax Credit requires all projects to use these guidelines, and projects that don't are not eligible for the tax credits. These credits often provide significant equity in a historic redevelopment project, which helps to close the "gap" between the cost of the project and what the market can support. This bill as drafted would eliminate this important economic development tool.

We are opposed to eliminating of the role that the State of Michigan Historic Preservation Office plays in the appeals process for property owners within an existing historic district. Having local elected officials without any such training or knowledge in historic preservation and its legal requirements is very concerning. The existing appeals process is clear and ensures that knowledgeable people, who are experts in best practices in historic preservation, hear such appeals.

As an organization, we are supportive of both pragmatic and sensible reform; and are gravely concerned about the above mentioned provision, and other found in the existing bill. We believe this bill has been hastily prepared with very limited time for public comment or stakeholders within the preservation community, who are most affected.

Historic preservation is a key tool in the economic development tool box for downtown revitalization and downtown management, and this bill, as proposed, would severely impact our State's redevelopment capabilities. Historic preservation is also an important placemaking tool, that helps to improve the Quality of Life, that engenders a sense of place.



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As currently drafted, we cannot support the proposed amendment. We request that this committee return this bill to the working group, in order to allow for additional stakeholder and community involvement in the process.

Thank you for accepting our written testimony.

Sincerely,

Eric Pratt – Chair
Legislative and Advocacy Committee Chair